

# Austin & Rogers, P.A.

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December 10, 2013

The Honorable Jocelyn Boyd  
Chief Clerk and Administrator  
The Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re:   • Docket Number 2013-392-E  
      • Intervenor, Invenergy Thermal Development LLC's First Discovery Request

Dear Ms. Boyd:

Enclosed for filing, please find Intervenor, Invenergy Thermal Development LLC's First Discovery Request, Coversheet and Certificate of Service.

All parties of record have been served with this filing, via electronic mail. Please notify the undersigned if you there is anything further, you may need.

Respectfully Submitted,  
**AUSTIN & ROGERS, P.A.,**

/S/ \_\_\_\_\_  
Richard L. Whitt

Enclosures  
RLW/cas

## STATE OF SOUTH CAROLINA

## (Caption of Case)

Joint Application of Duke Energy Carolinas, LLC and North Carolina Electric Membership Corporation for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 750 MW Combined Generating Plant Near Anderson, SC (Preliminary Information is Available for Viewing at the

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

## DOCKET/NDI

NUMBER: 2013 - 392 - E

(Please type or print)

Submitted by: Richard WhittSC Bar Number: 62895Address: 508 Hampton StreetTelephone: 8032517442Suite 300

Fax: \_\_\_\_\_

Columbia SC 29201

Other: \_\_\_\_\_

Email: rlwhitt@alrlaw.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other: Routine

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2013-392-E**

IN RE: Joint Application of Duke Energy )  
Carolinas, LLC and North Carolina )  
Electric Membership Corporation for a )  
Certificate of Environmental )  
Compatibility and Public Convenience )  
and Necessity for the Construction and )  
Operation of a 750 MW Combined )  
Generating Plant Near Anderson, SC. )

**CERTIFICATE OF SERVICE**

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have caused the Intervenor, Invenergy Thermal Development LLC's First Discovery Request, Coversheet, correspondence to Chief Clerk and this Certificate of Service in the above-referenced matter, to be served, via electronic mail on December 10, 2013 as addressed below:

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**The Honorable Jocelyn Boyd**  
Email: Jocelyn.Boyd@psc.sc.gov

/S/\_\_\_\_\_  
Carrie A. Schurg

December 10, 2013  
Columbia, South Carolina